

THE SAMUEL LAW FIRM

1441 BROADWAY, SUITE 6085, NEW YORK, NY 10018

PHONE: (212) 563-9884 | FAX: (212) 563-9870 | WEBSITE: www.samuelandstein.com

MICHAEL SAMUEL
michael@thesamuellawfirm.com

ADMITTED IN NY

April 7, 2023

VIA ECF

The Hon. Philip M. Halpern
U.S. District Court for the Southern District of New York
300 Quarropas Street
White Plains, NY 10601

**Re: *Juarez et al. v. Fuerte Construction LLC and Artemio Fuerte*
7:22-cv-05999 (PMH)**

Dear Judge Halpern:

We represent the plaintiffs, Carlos Juarez, Tomas Castaneda, Gerardo Castaneda Mendoza and Alex Reyes in this matter and write to respectfully request an extension until April 28, 2023, to file the Order to Show Cause why Default Judgment should not be entered against Defendants and to file supporting documents.

We regret our oversight in not making the present request sooner, regret the significant delay in this submission, and apologize to the Court for any resulting inconvenience. However we have experienced delays coordinating the completion, translation, review of documents and signatures of all four plaintiffs.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Michael Samuel
Michael Samuel, Esq.
THE SAMUEL LAW FIRM
Attorneys for Plaintiffs

Application granted. Plaintiffs' time to file an Order to Show Cause why Default Judgment should not be entered is extended to April 28, 2023. Per the Court's Order at Doc. 15, failure to do so will result in dismissal of this case for want of prosecution under Fed. R. Civ. P. 41(b).

The Clerk of Court is respectfully requested to terminate the motion sequence pending at Doc. 16.

SO ORDERED.



Philip M. Halpern
United States District Judge

Dated: White Plains, New York
April 7, 2023